Please indicate your preference by checking the appropriate boxes and provide reasons to support your views. Where there is insufficient space, please attach additional pages as necessary.

1.   Do you support the introduction of an instrument-level VCM based on a dynamic price limit model in Hong Kong?

☒   Yes

☐   No

Please give reasons for your view.

```



```

2.   Do you agree that the proposed VCM model should only be applied to the HSI and HSCEI constituent stocks in the securities market?

☐   Yes

☒   No

Please give reasons for your view.

```
Should apply to all stocks.


```

3.   Do you agree that the proposed VCM model should only be applied to the HSI, HHI, MHI & MCH (spot month and the next calendar month) index futures in the derivatives market?

☐   Yes

☒   No

Please give reasons for your view.

```
Should apply to all

```

4. Do you agree that the market should have a 15-minute uninterrupted trading period before the end of the last continuous trading?

☒ Yes

☐ No

Please give reasons for your view.

To avoid overnight risk in case market is suspended before close

5. Do you agree with the proposed reference price for the <u>securities</u> market, namely the price of last trade 5 minutes ago? If not, what would you prefer?

☒ Yes

☐ No, I would prefer: _____

Please give reasons for your view.

In case there is no trade 5 minutes ago, the mid of best bid and ask of the most recent quote in the past 10 minutes should be used as the reference price

6. Do you agree with our proposed reference price for the <u>derivatives</u> market, namely the price of last trade 5 minutes ago? If not, what would you prefer?

☒ Yes

☐ No, I would prefer: _____

Please give reasons for your view.

In case there is no trade 5 minutes ago, the mid of best bid and ask of the most recent quote in the past 10 minutes should be used as the reference price

7. Do you agree with the proposed triggering level for the <u>securities</u> market, namely <u>10%</u> from the reference price across the proposed instruments covered by the VCM? If not, what level would you prefer?

☒ Yes

☐   No, level that I would prefer: _____

Please give reasons for your view.

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8.   Do you agree with the proposed triggering level for the <u>derivatives</u> market, namely <u>5%</u> from the reference price across the proposed instruments covered by the VCM? If not, what level would you prefer?

☐   Yes

☒   No, level that I would prefer: 10% _____

Please give reasons for your view.

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9.   Do you agree that a maximum of two VCM triggers per trading session per instrument should be imposed to minimise market interruption?

☐   Yes

☒   No, I would prefer: No cap _____

Please give reasons for your view.

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10.   Do you support trading within a price limit during the cooling-off period? If not, do you prefer another approach?

☒   Yes

☐   No, another approach that I prefer: _____

Please give reasons for your view.

> But would prefer auction system that enables to bring liquidity on both sides and find the equilibrium price (instead of making the trading one-sided)

11. After the cooling-off period, do you support resuming the same dynamic price limit monitoring mechanism (i.e. ±10% (±5%) from the last trade 5 minutes ago in the securities (derivatives) market)? If not, do you prefer another approach?

☒ Yes

☐ No, I would prefer: _____

Please give reasons for your view.

12. Do you have any other suggestions on enhancing the resumption procedures?

13. Do you agree that the duration of the cooling-off period should be 5 minutes for both the securities and derivatives markets? If not, what would you prefer and why?

☒ Yes

☐ No, I would prefer: _____

Please give reasons for your view.

> In any case, the cooling-off period cannot be greater than the observation period otherwise the reference price would be stale

14. Do you agree with the additional market data dissemination for the proposed VCM model? If not, what would you propose and why?

☒ Yes

☐ No, I would propose: _____

Please give reasons for your view.

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15. If a VCM is triggered for a given instrument, should trading of related instruments (e.g. futures contract of different contract months) on the same underlying continue as normal?

☐ Yes

☒ No

Please give reasons for your view.

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│ LP and MM obligations should be waived for related instruments.    │
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16. If a VCM is triggered for a given instrument, should trading of derivatives (e.g. single stock options or warrants) of that instrument continue as normal?

☐ Yes

☒ No

Please give reasons for your view.

```
┌──────────────────────────────────────────────────────────────────┐
│ LP and MM obligations should be waived for related instruments.    │
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17. Do you have any other comments on the VCM proposal?

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│ HKEx may consider the Euronext model whereby they have both a      │
│ dynamic and a static price band and also an auction session for a  │
│ minimum of 5 minutes to find an IEP so in case the VCM is          │
│ triggered in the last 15 minutes, if the Euronext model is         │
│ adopted, the last 5 minutes of auction will become the closing     │
│ auction and you will not need to forgo the VCM.                    │
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18. Do you support the introduction of the new CAS model in the Hong Kong securities market?

☐ Yes

☒ No

Please give reasons for your view.

Model not adequate, e.g., aggressive orders carried forward from the CTS should be re-priced rather than cancelled

19. Do you agree that the new CAS model should only be applied to the major index constituent stocks (i.e. Hang Seng Composite LargeCap Index and Hang Seng Composite MidCap Index constituents as well as other Stock Connect Securities for Southbound trading)?

☐ Yes

☒ No

Please give reasons for your view.

Should apply to all because say for example, some of the constituent of other indices are in the CAS while some don't, leading to a different methodology for the closing price of its constituents.

20. Do you agree that the new CAS model should be applied to ETF? If yes, which type of ETF should be applied?

☒ Yes

☒ (i) Apply to all ETFs

☐ (ii) Only apply to ETFs with Hong Kong stocks as underlying

☐ No

21. Do you agree that at a later stage, the new CAS model should be expanded to other equity securities and funds as proposed? If so, when should the CAS be rolled out to these securities and funds?

    ☐ Yes, roll out time should be: _____

    ☒ No

    Please give reasons for your view.

    > Should be all at rollout

22. Do you agree that that the new CAS model should exclude structured products, equity warrants and debt securities?

    ☒ Yes

    ☐ No

    Please give reasons for your view.

23. Do you support introducing a price limit during the CAS?

    ☒ Yes

    ☐ No

    Please give reasons for your view.

24. Do you support a price limit of 5% during the Order Input Period for all CAS Securities?

☐ Yes

☒ No

Please give reasons for your view.

> The price limit should be wider in order to get as many orders in as possible to arrive at a representative IEP. During an auction, there is time for investors to consider larger price differences and for the market to find an representative equilibrium price even if its deviation from previous prices is large.

25. Do you agree that a further price limit within the best bid and best ask should be applied during the No-Cancellation Period and Random Closing Period?

☐ Yes

☒ No

Please give reasons for your view.

26. Do you agree that at-auction limit orders should be allowed throughout the CAS?

☒ Yes

☐ No

Please give reasons for your view.

27. Do you think short selling orders with a tick rule should be allowed during the CAS?

☐ Yes

☒ No

Please give reasons for your view.

> Short selling should be allowed and not subject to an uptick

28. If short selling order is to be allowed, should it be at or higher than the reference price?

    ☐ Yes

    ☒ No

    Please give reasons for your view.

29. Do you agree that order amendment and cancellation should be disallowed during the No-Cancellation Period and Random Closing Period?

    ☒ Yes

    ☒ No

    Please give reasons for your view.

    > No for No-Cancellation Period but Yes for Random Closing Period

30. Do you agree that random closing be adopted in the CAS to prevent gaming?

    ☒ Yes

    ☐ No

    Please give reasons for your view.

    > Nonetheless, random closing is not the answer to all manipulations in the market

31. If random closing is to be adopted, should it be over a period of up to 2 minutes or would you prefer a different duration?

☐   Up to 2 minutes

☒   A different duration: 30 seconds

Please give reasons for your view.

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32.   In the absence of a final IEP, do you agree that the reference price should be used as the closing price and for trade matching?

☐   Yes

☒   No

Please give reasons for your view.

```
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│ Depending on the reasons why there is no IEP formed. In case it is demand and │
│ supply imbalance, +/-5% from the reference price should be used for trade matching │
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33.   What would be the preferred duration of the CAS?

(i)   Same as the proposed model, i.e. 7-minute Order Input Period to end the CAS at 16:12

(ii)   5-minute Order Input Period to end the CAS at 16:10

(iii)   Others, please specify:

☐   Approach (i)

☒   Approach (ii)

☐   Approach (iii), please specify: _____

Please give reasons for your view.

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34. Do you agree that some features of the new CAS model may also be beneficial for the POS and/or the Trading Halts? If so, which feature(s)?

☒ Yes, the feature(s): _____

☐ No

Please give reasons for your view.

> Generally auction is good to reopen the market due to VCM or Trading Halts but not this proposed CAS model

35. Do you agree that any enhancements for POS and/or the Trading Halts should be implemented later rather than during the introduction of the new CAS?

☒ Yes

☐ No

Please give reasons for your view.

36. Do you foresee any issues with your day end processing such as margin calls in the cash market due to the extended trading time for 12 minutes? If yes, how may the issue be resolved?

☐ Yes, suggested solution: _____

☒ No

Please give reasons for your view.

37. To maintain the 45 minutes break before the start of AHFT, do you agree that the start time of AHFT to be changed from 17:00 to 17:15? If not, what time do you prefer?—

☒ Yes

☐   No, time that you prefer: _____

Please give reasons for your view.

38.   Which implementation approach for the securities market would you prefer:

    (i)   the development and testing of the VCM, CAS and Trading Halts functionalities are to be implemented together on the AMS/3.8 platform and be rolled out one by one; or

    (ii)   (1) the development, testing and rollout of VCM and CAS are to be implemented together on the AMS/3.8 platform, and (2) Trading Halts proposal is to be introduced as part of the Exchange's next-generation trading system, the Orion Trading Platform-Cash; or

    (iii)   Others, please specify.

    ☐   Approach (i)

    ☒   Approach (ii)

    ☐   Approach (iii), please specify: _____

Please give reasons for your view.

39.   What should be the implementation priority among the three initiatives (i.e. VCM, CAS and Trading Halts) in the securities market?

Please give reasons for your view.

VCM

40.   How long do you need to prepare for the rollout starting from the issuance of the specification for each initiatives:

    (i)   VCM:

    ☐   a). under 3 months;

    ☒   b). 4-6 months;

☐   c). 7-12 months

☐   d). >12 months

Please give reasons for your view.

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(ii)   CAS:

☐   a). under 3 months;

☒   b). 4-6 months;

☐   c). 7-12 months

☐   d). >12 months

Please give reasons for your view.

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- End -